



U.S. Department of Justice

Antitrust Division

*450 5th Street, N.W.
Washington, DC 20530*

June 11, 2024

Via ECF

The Honorable Julien X. Neals
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *United States et al. v. Apple Inc.*, No. 2:24-cv-04055 (JXN-LDW)

Dear Judge Neals:

We write to explain the amendments made in the First Amended Complaint (FAC) filed today. The FAC makes two changes, neither of which alter the substance of the allegations. First, the FAC adds 4 additional co-plaintiffs: Indiana, Massachusetts, Nevada, and Washington. Second, the FAC adds a seventh claim for relief under a recently passed Tennessee state law, which substantively mirrors Section 2 of the Sherman Act. The amendments are not made in response to Apple's letter seeking a pre-motion conference in advance of a motion to dismiss, and we do not believe this amendment has any effect on if or when Your Honor intends to hold that conference.

Respectfully Submitted,

s/ Jonathan H. Lasken

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA et al.,

Plaintiff,

v.

APPLE INC.

Defendants.

Case No. 2:24-cv-04055-JXN-LDW

CERTIFICATE OF SERVICE

I hereby certify that the above letter and this Certificate of Service were served upon defendant's counsel, Craig S. Primis, Esq., Devora W. Allen, Esq., Liza M. Walsh, Esq., and K. Winn Allen, Esq. 1301 Pennsylvania Avenue, NW, Washington, D.C., 20004, by CM/ECF on June 11.

BY: s/ Jonathan Lasken
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